REMARKS

Claims 1-58 are presented for examination. No claims are amended, and no claim is cancelled.

Figure 2 was objected to for failing to mention reference character "31". Applicants respectfully point out that Personal Images box 31 is described in the paragraph beginning at page 6, line 26. Nonetheless, it was noted that the same reference character "31" had erroneously also been used to identify a digital camera. Therefore, Fig. 2 and the same paragraph identified immediately above are amended to identify the digital camera of Fig. 2 with reference character "34".

Fig. 5 was objected to for failing to describe reference character "83" in the written description. Applicants thank the Examiner for noting this typographical error. The Edit Permission box 83 of Fig. 5 had erroneously been identified with reference character "81" in the written description. The paragraph beginning at page 12, line 29, of the written description has therefore been amended to replace reference character "81" with the more appropriate reference character "83" to maintain a proper antecedent basis with Fig. 5.

Claims 1-11 and 13-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bretschneider et al. (U.S. Pat. 6,128,629) in view of Cho (U.S. Pub. 2004/0064374) and further in view of Skinner (U.S. Pub. 2003/0033311). Claim 12 is rejected under 35 U.S.C. § 103(a) in view of Bretschneider et al., Cho, Skinner, and further in view of of Kouznetsov (U.S. Pub. 2003/0135821). Claims 23-58 were rejected under 35 U.S.C. § 103(a) in view of Bretschneider et al., Cho, and further in view of of Kouznetsov.

Specifically in reference to claim 1, the Office Action makes reference to Bretschneider et al.'s abstract, figure 2, and column 2, lines 6-15 to support an assertion that Bretschneider et al. show "a network for controlling creation and execution access of presentation files over the internet, and for maintaining a store of previously created files, the network server maintaining a user-database of registered users and a grouping-database of user-to-presentation-file grouping information, wherein the user-to-presentation file grouping information includes

a <u>created-file group</u> associating each respective registered user to presentation file **created by the respective registered user**."

Applicants respectfully disagree. It appears to Applicants that the Office Action might be reading much more into the Bretschneider et al. reference than is reasonably shown therein. Perhaps, the Office Action is interpreting the term "presentation file" very broadly to include not only an executable presentation file (i.e. a file capable of being executed to produce a slide show presentation having many objects and/or stencil images), but is also assuming that an object file or stencil file constitutes a presentation file by itself. Nonetheless, Applicants respectfully point out that Claim 1 clearly suggests that the presentation file is executable since claim 1 recites controlling the <u>execution</u> of the presentation file. Claim 1 further recites an "executable-file group associating each respective registered user to presentation files to which the respective registered has <u>execution</u> access." Thus, the present invention is not limited to an object file (i.e. singular pictures, sounds, video strips, etc..) or to a stencil file (i.e. an skeleton files having a suggested text/picture layout for a slide page that can be used to create a presentation by building upon the stencil), neither of which by themselves would constitute an executable presentation file, as generally accepted in the art.

This distinction is important since Bretschneider et al. do not teach or suggest maintaining a database of user-created, executable presentation files. Rather, Bretschneider et al. explain that a presentation software vendor is continuously updating their list of sample object and stencil files, but can include in a software purchase CD only those object and stencil files that were finished at the time the purchase CD is created. Therefore, Bretschneider et al. describe a service by which a software user may obtain software updates through the internet. Basically, a user creates and maintains all his/her presentation files locally (i.e. on his/her local machine without the need for permission from a vendor website), but whenever the presentation software is accessed, it checks to see if a software option for automatic update checking is activated. If this option is activated, then the software checks to see how long it has been since its last

on-line software update. If more than a predetermined time has elapsed, for example 90 days, then it activates a pop-up window asking the user if he/she would like the software to contact the vendor website to check for available software updates. If the user answers in the affirmative, the software goes to the vendor website and downloads any available software updates. This is made clear in Bretschneider et al.' Fig. 3, box 304, flow chart of Fig. 4, and in the following text excerpts:

Col. 1, line 60 to Col. 2, line 15 describe the problem being addressed by Bretschneider et al.'s invention. This section explains, ...

> "The PowerPoint program has associated sample presentation files, each sample presentation file including an example of a slide show that can be created with PowerPoint. Sample presentation files are distributed on a storage medium that also contains the PowerPoint Program, as part of the PowerPoint product. Since there is limited space available on the storage medium that is distributed, the number and size of sample presentations that can economically be distributed in this manner is limited. Additionally, all sample presentations that are to be distributed in this manner must be available prior to the date of product manufacturing in order to be included on the storage medium in the finished product.
> It is desirable to have a mechanism that allows an application program, such as a slide presentation program, to update the set of **data files** associated with the application program. Preferably, such a mechanism will retrieve data files from a network, such as the Internet. Additionally, a preferable mechanism will automatically determine whether an update of the data file set is advisable, based upon the duration since a previous update. Further, a preferable mechanism will automatically retrieve updated data files and begin a slide show. (emphasis added)

Bretschneider et al. summarize their propose solution (i.e. their invention) as follows, Col. 2, line 18 to Col. 3, line 12:

> "In accordance with this invention, a system and computer-based method of updating and viewing an electronic slide show presentation is disclosed. The method includes storing a **local** version of the slide presentation file and an indication of the most recent update to the slide presentation. When a user launches the local slide

presentation, the date of the most recent update to the slide presentation is retrieved, and used to determine whether a new update is advisable. Based on this determination, a remote slide presentation file is selectively retrieved from a remote computer. ,,, if a new update is advisable, the user is queried for whether to perform an update of the local slide presentation file. ... ...when a remote program file is retrieved, the retrieval date is stored. When the mechanism of the invention determines whether an update of the local program file is advisable, the date of the previous remote program file is retrieved. If the length of time since the previous remote program file retrieval exceeds a predetermined length of time, then an update of the local program file is advisable. ...As will be readily appreciated from the foregoing description, ...the invention provides a way of allowing a user to access information that is stored on a remote computer without requiring that the remote computer be accessed every time that the user desires to view the information. The invention allows ... an information supplier ... the opportunity to add updated information for access by the user. This allows a supplier to provide information and accessories to a user, where the information and accessories are not available at the time of preparing the software product. It also reduces the amount of space on the product storage medium that is required to store all information when a product transaction occurs.

Bretschneider et al.'s detailed explanation of their invention state in Col. 7, line 39 to Col. 8, line 29, that:

"FIG. 3 illustrates an exemplary slide presentation program window containing an "update" dialog window 304 that is displayed and controlled by the PPCentral update module 218 (FIG. 2) in one actual embodiment of the invention....In the actual embodiment, the "Tools" menu includes a menu command labeled "PowerPoint Central." When a user selects this menu command, the PPCentral update module 218 queries the system registry 220 for the time stamp of the most recent update to the local PPCentral slide presentation 214. If a predetermined amount of time has passed since the most recent update, the PPCentral update module 218 displays the "update" dialog 304. ...if the user responds affirmatively to the update dialog window 304, the PPCentral update module 218 determines whether such a more recent version of the remote PPCentral slide presentation 224 exists and, if so, retrieves the more recent version, replacing the local PPCentral slide presentation 214.

FIG. 4 illustrates a process 402 of updating a local PPCentral slide presentation file 214. ... At step 405, a determination is made of whether updating of the ppcentral.pps file is enabled. If not, a new file is not retrieved and flow proceeds to step 422, discussed below. If updating is enabled, flow proceeds to step 406, where the PPCentral update module 218 queries the system registry 220 and retrieves the date of the most recent update of the local PPCentral slide presentation file 214. At step 408, the PPCentral update module 218 determines whether the time that has elapsed since the most recent update exceeds a predetermined amount of time ..., the predetermined amount of time is ninety days. If an update is advisable, at step 410, the PPCentral update module 218 displays the "update" dialog window 304 (FIG. 3) and queries the user for whether to perform an update of the local PPCentral slide presentation file 214".

It is thus self-evident from the above, that Bretschneider et al. teach that only the vendor, not the user, may update the data files on the vendor's server. This is contrary to the present invention, which requires that the user be the creator of a presentation files on the server, since claim 1 recites that a "created-file group associating each respective registered user to presentation files created by the respective registered user."

Bretschneider et al. also requires that the user maintain a local copy of his presentation file, and that the vendor website be accessed for data updates only when a long time as elapsed from a previous update. In effect, Bretschneider et al. teach away from having a user log onto the vendor website each the user wants to access a presentation file. This also is contrary to the present invention, which requires that the user identify himself/herself in order to be granted access to a limited number of previously created, and executable, presentation files.

Furthermore, Bretschneider et al. are silent on recitation of any "user-database of registered users". This is because Bretschneider et al. do not track users. Rather, Bretschneider et al. track date stamps specifying the time of the last software update, irrespective of the user. Basically, Bretschneider et al. do not teach or suggest maintaining or requesting "user-identification information

identifying a target user within said user-database of registered users", as is required by the present invention.

It is further self-evident that Bretschneider et al. do not teach or suggest "a network server for controlling the creation and execution access of presentation files over the internet", as is required by the presently claimed invention. Bretschneider et al. merely provide a database of data file updates for use in presentation files. A user's local presentation software determines for itself if an update check is advisable, and if it is, then the local software accesses the vendor website and downloads a copy the data files. Thus, Bretschneider et al. do not teach or suggest that a user submit user identification information since such information is not needed or used by Bretschneider et al. invention. That is, Bretschneider et al. do not discrimination between users.

In essence, Bretschneider et al.'s vendor website has no control over whether the user may create a new presentation file because the presentation program (i.e. Microsoft's PowerPoint program) resides locally on the user's computers. Similarly, Bretschneider et al.'s vendor website has no control over what presentation file a user chooses to execute since the presentation program and presentation files both reside locally on the user's computer. Additionally since Bretschneider et al. do not teach maintaining a record on the vendor server of presentation files created by a user, it is clear that Bretschneider et al. do not teach or suggest a "grouping-database of user-to-presentation_file grouping information, wherein said user-to-presentation_file grouping information includes a created-file group associating each respective registered user to presentation files created by the respective registered user" Similarly, since Bretschneider et al. have no control over (or knowledge of) what presentation files a user chooses to execute on his/her own local computer, it is clear that Bretschneider et al. do not teach or suggest "an executable-file group associating each respective registered user to presentation files to which the respective registered has execution access".

Additionally since Bretschneider et al. do not teach or suggest maintaining a record of user identification nor do they teach maintaining access control over

presentation files created by a user, it is self-evident that Bretschneider et al. do not teach of suggest a "network server [that] responds to said user-identification information identifying a target user within said user-database of registered users by granting said user-access device the file access permissions associated with said target user."

Applicants are therefore at a loss to determine how the teaching of Bretschneider et al. read on the present invention.

The Office Action concedes that Bretschneider et al. do not teach an executable-file group associating each respective registered user to presentation files to which the respective registered user has execution access, and a purchasable-file group associating each respective user to presentation files to which the respective registered user has previously been granted purchase access. But the Office Action asserts that Skinner teaches "an executable-file group associating each respective registered user to [executable?] presentation files to which the respective registered [user] has execution access, and a purchasable-file group associating each respective registered user to presentation file to which the respective register user has previously been granted purchase access (see figure 1; figure 2, character 232; and page 1, paragraph 7).

Applicants respectfully disagree, and point out that figure 1 merely shows an interconnection through the internet of various vendors, suppliers, manufacturers, purchasers, data bases, etc. with no mention or suggestion of file groups as recited in the present claims. In regards to figure 2, character 232 and page 1, paragraph 7, Applicants respectfully point out that these citations do not teach or suggest an executable-file group or purchasable-file group as recited in the presently claimed invention.

Firstly, Skinner does not teach a system for controlling who gains access to what. Rather, Skinner merely provides a search engine to facilitate the matching of buyer's needs to seller's products. That is, Skinner teaches a data base that holds information regarding which manufacturer can produce what

type of products, what type of materials are provided by what supplier, what types of features are sought by which buyers, etc. Any buyer can access the database to obtain a list of viable suppliers/manufactures for his/her needs, and then contact the supplier/manufacturer directly through a supplied contact format. If the buyer and the supplier/manufacturer reach a purchase agreement, they finish their transaction independently and, if desired, can make use of Skinner's contract generator, which includes a list of the commonly used contract clauses. Basically, Skinner's server 120 does not know what buyer and manufacture/supplier have agreed upon a purchase contract. Such internal business arrangements are confidential to the buyer and supplier, and not made available to Skinner's database. It is generally known in the area of commerce that a business's transactions are confidential and should not be released to third parties needlessly since such information can hinder the competitiveness of a business.

In the cited paragraph 7, Skinner basically summarizes the use of his on-line forum for helping buyers find an appropriate manufacturer or supplier that suits their needs, and vise-versa. It is noted that Skinner states that his database presents information related to products, suppliers, materials, and services. But it must be emphasized that the word "presents" as used by skinner merely means that information is provided. It does not means that skinner maintains executable presentation files, as used in the presently claimed invention. As it well known, a presentation file as used in the presently claimed invention and described in the specification of the presently claimed invention, refers to a series of slide-like executable files that are presented in a predefined sequence. Thus, it should be clear that Skinner does not teach or suggest "an executable-file group associating each respective registered user to [executable?] presentation files to which the respective registered [user] has execution access", as is suggested by the Office Action. This is especially self-evident when one considers that Skinner does not teach or suggest controlling access to specific presentation files based on a user's registration information. Indeed, Skinner does not mention the need for requesting user identification information. A user merely submits information regarding specific product needs, and searches

through a database of suppliers or manufacturers that may meet some of those needs.

In regards to character 232, which is an internal part of transaction Engine 230, Skinner explains that (page 5, paragraph 0030), "Transaction Engine 230 provides functionality for performing one or more transactions between users". Thus, the transactions are between users, and Skinner does not teach a purchasable-file group specifying a list of presentation files that a register use has been granted permission to purchase. A detailed description of the functionality of Transaction Engine 230 and Negotiation Support Module 232 is given in page 6, paragraph 0040, wherein it is explained that:

> "[0040] Transaction Engine 230 provides various transactional functions of Interactive Data Resource 200 for facilitating customer/supplier interaction. In a preferred embodiment, Transaction Engine 230 enables electronic contracting and transaction execution for purchase transactions between customers and suppliers. ...Selection Module 231 may allow a user to identify one or more products, services, or materials desired for purchase from a particular supplier. Identification may include defining transaction information, such as quantity, desired delivery date, and delivery location. Negotiation Support Module 232 may provide a secure channel of communication between customers and suppliers for negotiating the details of more complex transactions, such as those for custom materials or services. Negotiation Support Module 232 may include communication archiving, negotiation process automation, negotiation status monitoring, real time communications, negotiation counseling or mediation, and other functions for supporting the negotiation process. Contracting Module 233 may provide tools for drafting, finalizing, and formalizing a contract for materials or services. Contracting Module 233 may include model contracts for various transaction types, pre-approved contract clauses, deal frameworks, draft and revision sharing and monitoring, and user authentication and digital signatures for contract finalization. ...".

From the above, it is clear that character 232 merely provides a secure channel for communication between a buyer and a seller. It does not provide a list purchasable items (presentation files or otherwise) that a customer has previously been granted permission to purchase, and to accept purchases orders

for the items. Indeed. character 232 cannot accept any purchases orders since it does not sell anything. It is merely a communication channel between a prospective buyer and a seller.

Thus, it is clear that Skinner does not teach or suggest a database for "accepting purchase orders for only those presentation files whose purchasable-file group associates said target user", as is required by the presently claimed invention.

Since neither Skinner nor Bretschneider et al. teach a network server for controlling access for creating or executing a presentation file based on a user identification database, nor do either teach or suggest maintaining a purchasable-file group specifying which individual users may purchase which individual presentation file, it is clear that the present invention is not taught or suggested by the cited prior art, singularly or in combination.

In reference to Kouznetsov, the Office Action states that, "Kouznetsov teaches an online presentation software using website development tools (see abstract), in which he teaches wherein the access password is an edit-access password permitting edit access to the plurality of selected registered user upon their respective submission of the edit-access password to the network server (see page 2, paragraph 17)."

Applicants respectfully point out that Kouznetsov's paragraph 17 states,

> "[0017] As described above, the software necessary to create, edit, and view presentations may be downloaded from server 12 at the time it is needed or it may be installed on a user's computer in advance".

Firstly, Applicants respectfully submit that paragraph 17 is silent on recitation of an edit-access password, or any other kind of password. Secondly, Applicants further point out that the filing date of the present Application (February 2, 2002) predates the filing date of the Kouznetsov reference (January 17, 2003), and the Kouznetsov reference is therefore not valid prior art.

Similarly, the filing date of the present Application (February 2, 2002) predates the filing date of the Cho reference (September 26, 2002), and the Cho is therefore not valid prior art.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration of the present application.

Respectfully submitted,

Rosalio Haro
Registration No. 42,633

Please address all correspondence to:

Epson Research and Development, Inc.
Intellectual Property Department
150 River Oaks Parkway, Suite 225
San Jose, CA 95134
Phone: (408) 952-6000
Facsimile: (408) 954-9058
Customer No. 20178

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